

# **EXHIBIT 6**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

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Videotaped deposition of  
WALTER PARFEJEWIEC

November 8, 2018

9:00 a.m.

Taken at:

Climaco, Wilcox, Peca & Garofoli  
55 Public Square, Suite 1950  
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

1 about what you consider to be the opioid problem  
2 earlier today, you referenced your concern about  
3 your sons a number of times.

4 Do you recall that?

5 A. Yes.

6 Q. And I'd like to know, have you  
7 personally ever taken an opioid?

8 MR. BADALA: Objection to form.

9 I'm going to instruct you not to  
10 answer that question.

11 Q. Are you going to follow your  
12 counsel's instruction?

13 A. Yes.

14 Q. Yes, you're going to follow it or  
15 yes, you're answering my question?

16 A. Yes, I'm going to follow his  
17 instruction.

18 Q. As far as you know, have your sons  
19 or any family member ever taken an opioid?

20 MR. BADALA: Objection.

21 I'm going to instruct you again not  
22 to answer that question.

23 THE WITNESS: Okay.

24 MR. LONERGAN: Notwithstanding that  
25 he referenced his sons voluntarily a number of

1 times today as the basis of his concern about  
2 opioids, you're going to tell him that he can't  
3 answer the question?

4 MR. BADALA: Taking the pill and his  
5 concern are completely different.

6 Q. Are you going to follow your  
7 counsel's advice and not answer my question?

8 A. Yes.

9 Q. Do you know anyone -- and this is a  
10 yes or no question. Do you know anyone who has  
11 ever been addicted to opioids?

12 A. No.

13 Q. This is, again, a yes or no  
14 question. Do you know anyone who has died or  
15 been hospitalized due to opioid use?

16 MR. BADALA: Objection to form.

17 A. No.

18 MR. LONERGAN: Why don't we take a  
19 break. I might be done.

20 MR. BADALA: Okay.

21 THE VIDEOGRAPHER: Off the record,  
22 1:44.

23 (Recess had.)

24 THE VIDEOGRAPHER: Back on the  
25 record, 1:54.